

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
)
 v.) 21-cr-41-JL
)
ANDREW SPINELLA)

UNITED STATES' SENTENCING MEMORANDUM

The United States requests that the Court impose one year of probation and a \$500 fine. This is the third case the Court has sentenced based on individuals lying to banks to assist Ian Freeman in operating his unlicensed money transmitting business. (See United States v. Renee Spinella and United States v. Nobody). Of these individuals, Mr. Spinella is the least culpable.

Unlike Mr. Nobody and Ms. Spinella (Mr. Spinella's spouse) it does not appear that Mr. Spinella had a substantial prior relationship with Freeman or a detailed understanding about the intricacies of Freeman's business (although he did understand the broad outlines). Moreover, when the FBI approached Freeman in 2018, toward the start of this investigation, Mr. Spinella was honest and forthright about his conduct. For these reasons, the United States seeks a lesser penalty for Mr. Spinella than it imposed on Mr. Nobody or Ms. Spinella.

Dated: August 26, 2022

Respectfully submitted,
JANE E. YOUNG
United States Attorney

By: /s/ Seth R. Aframe
Seth R. Aframe
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded via ECF electronic filing to counsel of record.

/s/ Seth R. Aframe
Seth R. Aframe, AUSA